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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

S. JOHN MASTRANGELO, an individual.

Plaintiff,

V.

GOODLEAP, LLC, a foreign limited-liability company; EQUIFAX INFORMATION SERVICES, LLC, a foreign limited-liability company; EXPERIAN INFORMATION SOLUTIONS, INC., a foreign corporation; TRANS UNION LLC, a foreign limited-liability company,

Defendants.

Case No. 2:21-cv-01539-GMN-NJK

JOINT STIPULATION FOR EXTENSION OF SCHEDULING ORDER DEADLINES

FIRST REQUEST

Complaint Filed: August 19, 2021

Plaintiff S. John Mastrangelo and Defendants GoodLeap, LLC, Equifax Information Services, LLC, Experian Information Solutions, Inc., and Trans Union LLC, by and through their counsel of record, hereby submit this Joint Stipulation for Extension of Scheduling Order Deadlines to extend the remaining deadlines within the Scheduling Order entered on October 20, 2021, by 60-days. (ECF No. 18.)

The parties require additional time for discovery to facilitate the resolution of this action through negotiated settlements before incurring the additional costs to retain experts and prepare expert reports compliant with Federal Rule of Civil Procedure 26(a)(2). Plaintiff has had meaningful settlement negotiations with each defendant and believes the matter will be resolved within 60-days if the remaining deadlines are extended to avoid expending resources that the

1 parties may earmark for settlement. As such, good cause exists for the requested extension.

2 **I. DISCOVER THAT HAS BEEN COMPLETED**

3 The parties have completed the following discovery:

4 On October 21, 2021, Plaintiff served his Initial Disclosures under Rule 26(a)(1).

5 On November 4, 2021, GoodLeap made its Initial Disclosures under Rule 26(a)(1).

6 On December 3, 2021, Plaintiff served his First Set of Interrogatories, Requests for
7 Production of Documents, and Requests for Admissions on GoodLeap, Equifax, Experian, and
8 Trans Union.

9 On December 7, 2021, Equifax served its First Set of Interrogatories, Requests for
10 Production of Documents, and Requests for Admissions on Plaintiff.

11 On December 8, 2021, Experian served its Initial Disclosures under Rule 26(a)(1).

12 **II. DISCOVERY THAT REMAINS TO BE COMPLETED**

13 The following discovery by the parties remains to be completed:

14 Plaintiff and Defendants will disclose expert witnesses and will produce expert reports
15 and possibly rebuttal reports to any expert report produced by other parties.

16 Plaintiff and Defendants will serve written discovery and follow-up written discovery,
17 including Interrogatories, Requests for Production and Requests for Admissions.

18 Plaintiff and Defendants will take the depositions of Rule 30(b)(6) witnesses, percipient
19 witnesses, and expert witnesses.

20 The parties will respond to the outstanding written discovery requests.

21 **III. REASONS WHY REMAINING DISCOVERY WAS NOT COMPLETED**

22 The discovery that remains to be complete has not been and cannot be completed within
23 the time limits set by the current discovery plan. The parties' expert reports are currently due on
24 January 13, 2022. The parties have made substantial progress with regard to settlement
25 negotiations. However, the parties will not be able to settle the case before expert reports are due.
26 The parties do not want to expend resources on expert costs and need to focus their efforts and
27 resources on settlement.

1 **IV. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY**

2 The parties hereby stipulate to the following schedule for completing all remaining
3 discovery:

4 **Fed. R. Civ. P. 26(a)(2) Disclosure (Experts).**

5 Disclosures identifying experts and final expert reports shall be made by **March 14, 2022**.
6 This is 60 days before the discovery cut-off date. Rebuttal expert disclosures shall be made by
7 **April 13, 2022**, which is 30 days after the initial disclosure of experts.

8 **Discovery Cut-Off Date.**

9 The amended discovery cut-off date is **May 13, 2022**.

10 **Dispositive Motions.**

11 The parties shall have until **June 13, 2022** to file dispositive motions, which is 30 days
12 after the close of discovery.

13 **Pretrial Order.**

14 The Joint Pretrial Order shall be filed no later than **July 13, 2022**, which is thirty (30) days
15 after the date set for the filing of dispositive motions. In the event dispositive motions are filed,
16 the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after decision
17 on the dispositive motions or by further order of the Court.

18 Dated: January 11, 2022

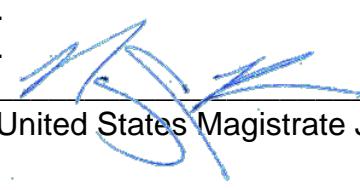
 Dated: January 11, 2022

19 **LAW OFFICE OF
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26 IT IS SO ORDERED.
27 Dated: January 12, 2022

28 
United States Magistrate Judge

1 Dated: January 11, 2022

2 **QUILLING SELANDER LOWNDS
WINSLETT & MOSER, P.C.**

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10 Dated: January 11, 2022

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24 Dated: January 11, 2022

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